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Lead Counsel for the Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. CV-07-5944 SC
MDL No. 1917

This Document Relates To:

ALL INDIRECT PURCHASER ACTIONS

**STIPULATION AND ~~PROPOSED~~
ORDER VACATING CLERK'S ENTRY
OF DEFAULT**

WHEREAS, upon request of counsel for plaintiffs, the clerk entered default as to Defendants Irico Display Devices Co., Ltd. and Irico Group Corporation in both the Direct Purchaser ("DP") and Indirect Purchaser ("IP") Actions. ECF No. 4727 (July 20, 2016); ECF No. 4729 (July 22, 2016);

WHEREAS, on February 1, 2018, the Court granted Irico's motion to set aside default and denied the motion for entry of default judgment as moot in the DP Action (ECF No. 5240), and the Court ruled that "[t]he case against the Irico Defendants having now reopened, the [Direct Purchaser Plaintiffs] are free to undertake jurisdictional discovery" (*Id.* at 20);

WHEREAS, counsel for the IP Plaintiffs ("IPPs") and the Irico Defendants have met and conferred on continuing proceedings in the IP actions and proceeding with the jurisdictional discovery;

WHEREAS, given the Court's February 1 ruling in the DP action, IPPs submit that good

1 cause exists under Federal Rule of Civil Procedure 55(c) to vacate the entry of default, and request
2 that the Court vacate the clerk's entry of default (*i.e.*, ECF No. 4729) as to the Irico Defendants;

3 WHEREAS, IPPs request that the Court permit jurisdictional discovery pertaining to the
4 Irico Defendants in the IP Actions;

5 WHEREAS, the Irico Defendants do not oppose the relief sought by this motion;

6 WHEREAS, IPPs served written jurisdictional discovery on the Irico Defendants on March
7 27, 2018, and the parties have agreed that responses and objections shall be due on or before May
8 25, 2018;

9 WHEREFOR, IT IS HEREBY STIPULATED AND AGREED by and between counsel for
10 IPPs and Irico that the entry of default (ECF No. 4729) is hereby vacated, and that the case against
11 the Irico Defendants having now reopened, the IPPs are free to undertake jurisdictional discovery.

12 Dated: April 5, 2018

Respectfully submitted

13 /s/ Mario N. Alioto

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19 *Lead Counsel for the Indirect Purchaser Plaintiffs*

20 Dated: April 5, 2018

Respectfully submitted

21 /s/ Stuart Plunkett

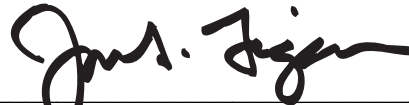
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*Attorneys for Defendants Irico Group Corp.
and Irico Display Devices Co., Ltd.*

9 SO ORDERED.

10 April 6, 2018



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Jon S. Tigar
United States District Judge

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I, Christopher T. Micheletti, hereby attest, pursuant to United States District Court,
Northern District of California Civil Local Rule 5-1(i)(3), that concurrence in the filing of this
document has been obtained from the other Signatories hereto.

By: /s/ Christopher T. Micheletti
Christopher T. Micheletti